



1 Dated: February 27, 2025

Respectfully submitted,

2 By: /s/ Rachel B. Abrams

3 RACHEL B. ABRAMS (Cal Bar No. 209316)

4 ADAM B. WOLF (Cal Bar No. 215914)

**Peiffer Wolf Carr Kane Conway & Wise, LLP**

5 555 Montgomery Street, Suite 820

San Francisco, CA 94111

6 Telephone: 415.766.3544

Facsimile: 415.840.9435

7 Email: rabrams@peifferwolf.com

awolf@peifferwolf.com

8 TIFFANY R. ELLIS (*Admitted PHV*)

9 **Peiffer Wolf Carr Kane Conway & Wise, LLP**

2229 Trumbull St.

10 Detroit, MI 48216

Telephone: 313.210.1559

11 Facsimile: 415.840.9435

Email: tellis@peifferwolf.com

12 *Counsel for Plaintiff*

13  
14  
15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on February 27, 2025, I electronically transmitted the foregoing  
17 **NOTICE OF FILING OF NEW ACTION** to the Clerk's Office using the CM/ECF System  
18 for filing thereby transmitting a Notice of *Electronic* Filing to all CM/ECF registrants.  
19

20 /s/ Rachel B. Abrams

Rachel B. Abrams